

GDPR - DATA PRIVACY NOTICE

1. Your personal data – what is it?

Personal data relates to a living individual who can be identified from that data. Identification can be by the information alone or in conjunction with any other information in the data controller's possession or likely to come into such possession. The processing of personal data is governed by the General Data Protection Regulation (the "GDPR").

2. Who are we?

We are Berkeley Shaw Real Estate Limited (BSRE). Our Head office is The Ternary, Old Haymarket, Liverpool, L1 6ER. BSRE is the data controller (contact details below). This means it decides how your personal data is processed and for what purposes. BSRE are Registered on the Information Commissioner's Office Data Protection Register under number ZA234220.

3. What type of information may be collected?

- Personal identification data (Name, surname, title, date of birth)
- Contact information data (Email, phone number, address, country)
- Bank account details
- Any other information that you decide to voluntarily share us (Feedback, opinions, reviews, comments, uploaded files, interests, information provided for our due diligence process)
- Personal data about other named parties to Contractual Documentation e.g. the lease or those you authorise to pay monies as your alias (e.g. your spouse or business partners). You must have their authority to provide their personal data and share this Privacy Notice with them beforehand.

4. How do we process your personal data?

BSRE complies with its obligations under the "GDPR" by keeping personal data up to date; by storing and destroying it securely; by not collecting or retaining excessive amounts of data; by protecting personal data from loss, misuse, unauthorised access and disclosure and by ensuring that appropriate technical measures are in place to protect personal data.

We use your personal data for the following purposes: -

- To maintain our own accounts and records.
- To provide you with information about our services/property requirements.
- Photographic identification and proof of address documents to comply with Anti Money Laundering Regulations, reference purposes and other Regulatory or ID Checks.
- Banking and financial details (to establish the source of funds where a transaction is involved).
- Payment data, such as data necessary for processing payments and fraud prevention, including credit/debit card numbers, security code numbers and other related billing information.
- Manage the take on or handover of managed property.
- Monitoring including: CCTV footage, vehicle details, swipe/fob records, PC login details, use of our IT and communications systems.
- Organise services from suppliers and service providers.
- Contact details to effect essential repairs and maintenance on tenanted properties, and to be passed to authorised contractors as required.
- Further business information necessarily processed in a project or client contractual relationship with KMR or voluntarily provided by you, such as instructions given, payments made, requests and projects.
- Information we may collect from other sources: such as agents, lawyers, accountants and other professional advisors who are acting on your behalf.
- Sharing of market intelligence (including property transactions) with property professionals and service companies.
- Any other information that you decide to voluntarily share with us (Feedback, opinions, reviews, comments, uploaded files, interests, information provided for due diligence process)

- Personal data about other named parties or those you authorise to transact or delegate third party authority to (e.g. spouse, business partner) You must have their authority to provide their personal data and share with them with this Privacy Notice beforehand.
- We may also obtain information available on public registers to facilitate the work we do and perform due diligence; this may include information from credit reference agencies or fraud prevention agencies, electoral roll, court records of debt judgments and bankruptcy, land registry, Companies house and other publically available sources.
- To the extent applicable by law, we may also obtain information from other sources, such as public databases, joint marketing partners, social media platforms and other third parties. For example, depending on your social media settings, if you chose to connect your social media account to our account, certain data from your social media account will be shared with us, which may include data that is part of your profile.
- Process job vacancy applications and CV's and other Professional information (such as job title, previous positions, and professional experience).
- Comply with legal obligations and to establish, exercise, or defend ourselves from legal claims.

5. What is the legal basis for processing your personal data?

We will only use personal information when the law allows us to under the following categories:

- **Consent:** where you have given clear consent to us to process your personal data for a specific purpose.
- **Contract:** the processing is necessary for a contract you have with us.
- **Legal obligation:** where we need to comply with a legal obligation.
- **Legitimate interests** - Processing is necessary for carrying out obligations under employment, property ownership and tenancy obligations and property services and to keep you informed of properties for rent or sale.

6. Sharing your personal data

Your personal data will be treated as strictly confidential and will only be shared with other departments in BSRE and associated companies and in relation to providing you with a complete property service.

We may also disclose your information to the third parties listed below where we are required to do so to comply with our contractual, legal or regulatory requirements. Such as for the following purposes:

- Third parties as necessary in the event of a claim or dispute relating to the use of our services, law enforcement bodies and/or other regulatory entities in order to comply with any legal obligation or court order.
- HM Revenue & Customs, regulators and other authorities acting as processors or joint controllers based in the United Kingdom who require reporting of processing activities in certain circumstances.
- Landlords in relation to your Property requirements.
- Financial organisations and credit reference agencies.
- Debt collection and tracing agencies including bailiffs.
- Security organisations.
- Legal and other advisors.
- Accountants.
- Other parties to a transaction or engagement.
- Former owners and managing agents of the properties we manage and subsequent owners and managing agents that we hand over to.
- Insurance brokers.
- Tenants of and suppliers to your properties.
- Contractors required for Repairs and Maintenance at Managed Properties.

We require all third parties to respect the security of your personal data and to treat it in accordance with the law. We do not allow our third-party service providers to use your personal data for their own purposes and only permit them to process your personal data for specified purposes and in accordance with our instructions.

7. How long do we keep your personal data?

The personal information that you provide will be retained by us in accordance with applicable laws, industry guidance and our internal Retention Policy. However, we will take reasonable steps to destroy or de-identify personal information we hold if it is no longer needed for the purposes set out above. We will only hold your personal information on our systems for as long as is necessary for the relevant purposes for which it was collected.

Where you are a job applicant we will keep the information we receive about you throughout the recruitment process and for a period of six months after completion of the process. If you have not commenced employment with us we will then remove your information where we have not received any query or challenge which is outstanding. We will retain it if needed to deal with any outstanding query or challenge to the process. Where you become our employee we will keep your information where relevant to your employment and this will become part of your employment records.

8. Your rights and your personal data

Unless subject to an exemption under the GDPR, you have the following rights with respect to your personal data: -

- The right to request a copy of your personal data which BSRE holds about you.
- The right to request that the BSRE corrects any personal data if it is found to be inaccurate or out of date.
- The right to request your personal data is erased where it is no longer necessary for BSRE to retain such data.
- The right to withdraw your consent to the processing at any time.
- The right to request that BSRE provide the data subject with his/her personal data and where possible, to transmit that data directly to another data controller.
- The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- The right to object to the processing of personal data.
- The right to lodge a complaint with the Information Commissioners Office.

9. Further processing

If we wish to use your personal data for a new purpose, not covered by this Data Protection Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior consent to the new processing.

10. Contact Details

To exercise all relevant rights, queries of complaints please in the first instance contact the Operations Manager at The Ternary, Old Haymarket, Liverpool L1 6ER Email: info@berkeleyshaw.com
You can contact the Information Commissioners Office on 0303 123 1113 or via <https://ico.org.uk/global/contact-us/> or at the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire. SK9 5AF.